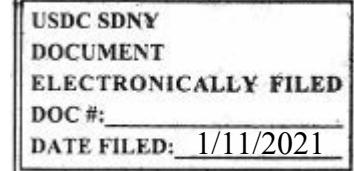


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January 11, 2021

Honorable Alison J. Nathan
 United States Courthouse
 40 Foley Square Courtroom 906
 New York, NY 10007

Re: United States v. John Geraci 18-CR-00715

Dear: Judge Nathan

We file this letter to respectfully request a continuance of the January 15, 2021, surrender date for Mr. John Geraci to March 8, 2021, to allow Mr. Geraci to continue treatment for his ongoing medical issues. This Court previously granted a continuance of Mr. Geraci's surrender date from March 23, 2020, to May 1, 2020, from May 1, 2020, to July 1, 2020, from July 1, 2020, to September 1, 2020, from September 1, 2020, to September 4, 2020, from September 4, 2020, to October 5, 2020, from October 5, 2020 to December 4, 2020 and from December 4, 2020 to January 15, 2021. See Dkt. Nos. 78, 80, 82, 84, 86, 88, 90.

As discussed in our August 31, 2020 letter (Dkt. 83) Mr. Geraci was released from the hospital on August 30, with orders to see a neurology specialist as soon as possible for further diagnoses and treatment. On September 3, Mr. Geraci was given an order to get an MRI brain scan without contrast for diagnostic purposes. However, the referring physician was not able to conduct the test at that time. Instead, Mr. Geraci was instructed to schedule a later appointment to have the test. Mr. Geraci subsequently had the MRI and scheduled a follow up appointment with the neurologist. The follow up appointment occurred on September 24, 2020. At that time, upon review of the MRI, the neurologist observed that the results were abnormal and instructed Mr. Geraci to schedule an appointment with a Neurosurgeon to discuss the possibility of surgery.

Mr. Geraci subsequently saw the neurosurgeon on October 8, 2020. At that time, he was directed to yet another specialist for yet another follow up appointment. On December 1, 2020, Mr. Geraci saw an orthopedic specialist, who diagnosed him with impingement syndrome, supraspinatus tendinitis, subacromial bursitis, and biceps tendonitis in his left shoulder. In order to appropriately treat these issues Mr. Geraci was told to attend physical therapy two to three times a week for the next four to six weeks.

Unfortunately, due to the holiday season, as well as the ongoing global health crisis, Mr. Geraci was put on a waitlist for nearly a month before he was able to schedule his first

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appointment for physical therapy. It was not until the first week of January that Mr. Geraci was finally able to get off the wait list and begin his therapy. Thus far he has had two appointments and has six more scheduled for the next two weeks. (Ex. A.) Overall, Mr. Geraci has been informed that he will need fifteen appointments over the next eight weeks. Therefore, his last appointment will be on or around March 1, 2021.

While Mr. Geraci understands the Court has already granted several extensions, until recently Mr. Geraci had not received any treatment for his ailments. He has had to schedule appointments with three different specialists, which has been very difficult in the current global health crisis. He has now had to work with a physical therapist to get on their schedule and begin treatment. Now that he has finally begun receiving treatment, we believe that there would be no benefit to preventing him from completing it.

Counsel for Mr. Geraci has conferred with Mr. Skinner and Mr. Lenow, AUSAs on this matter and they have consented to Mr. Geraci's request for this temporary delay of his surrender date to March 8, 2021.

For the above-stated reasons, Counsel for Mr. Geraci respectfully requests a continuation of Mr. Geraci's surrender date from January 15, 2021 to March 8, 2021.

SO ORDERED.

Sincerely,
Marissa E. Miller

/s/ Marissa E. Miller
Lyn R. Agre

/s/ Lyn R. Agre
Counsel for John Geraci

